

STEVEN S. ALM
United States Attorney
District of Hawaii

ELLIOT ENOKI
First Assistant U.S. Attorney

OMER G. POIRIER
Assistant U.S. Attorney
Room 6-100, PJKK Federal Bldg.
300 Ala Moana Blvd., Box 50183
Honolulu, Hawaii 96850
Telephone: (808) 541-2850

Attorneys for Plaintiff
UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUN 22 2000

at 4 o'clock and 5 min. P.M.
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
MANSON WOO, (01))
YAN XIA XU, (02))
)
Defendants.)
_____)

CR. NO.

INDICTMENT

[18 U.S.C. §§ 2318,
2319(b)(1), 2320]

INDICTMENT

Count 1

The Grand Jury charges:

From on or about January 1, 2000 and continuing until on or about June 8, 2000, in the District of Hawaii and elsewhere, the Defendants, MANSON WOO and YAN XIA XU, did willfully and for purposes of commercial advantage and private financial gain, infringe the copyright of various Chinese language audiovisual works distributed by Tai Seng Video Marketing, Inc., at least ten copies of which the Defendant did reproduce and distribute within a 180-day period with a retail

value of more than \$2,500 without authorization of the copyright holder.

All in violation of Title 17, United States Code, Section 506(a) and Title 18, United States Code, Section 2319(b) (1).

Count 2

The Grand Jury further charges:

From an unknown date, but at least as early as January 1, 2000 and continuing until on or about June 8, 2000, in the District of Hawaii and elsewhere, the Defendants, MANSON WOO and YAN XIA XU, did intentionally traffic in goods, to wit unauthorized copies of Chinese language audiovisual works distributed by Tai Seng Video Marketing, Inc. in connection with which counterfeit marks were used that were identical to and substantially indistinguishable from genuine marks in use and registered for Tai Seng Video Marketing, Inc. audiovisual works on the principal register of the United States Patent and Trademark Office and the use of which counterfeit marks was likely to cause confusion, to cause mistake and to deceive.

All in violation of Title 18, United States Code, Section 2320.

Count 3

The Grand Jury further charges:

From an unknown date, but at least as early as January 1, 2000 and continuing until on or about June 8, 2000, in the District of Hawaii and elsewhere, the Defendants, MANSON WOO

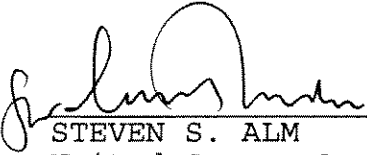
and YAN XIA XU, knowingly trafficked in a counterfeit label affixed and designed to be affixed to a copyrighted audiovisual work.


All in violation of Title 18, United States Code, Section 2318.

DATED: June 22, 2000, at Honolulu, Hawaii.

A TRUE BILL

151
FOREPERSON, GRAND JURY


STEVEN S. ALM
United States Attorney
District of Hawaii


ELLIOT ENOKI
First Assistant U.S. Attorney


OMER G. POIRIER
Assistant U.S. Attorney

USA vs. MANSON WOO, ET AL.
Cr. No.
"Indictment"